

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

“BARBARA;” “SARAH,” by guardian, parent,
and next friend “SUSAN;” and “MATTHEW,”
by guardian, parent, and next friend “MARK;”
on behalf of themselves and all those similarly
situated,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United
States, in his official capacity, et al.,

Defendants.

Case No. 1:25-cv-244

**DECLARATION OF TIANNA MAYS IN SUPPORT OF
PLAINTIFFS’ MOTION FOR CLASS CERTIFICATION**

I, Tianna Mays, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am counsel for Plaintiffs in this case and make this declaration to describe my qualifications and those of my colleague to serve as counsel for the Proposed Class in this case.

Tianna Mays

2. I specialize in litigation and am a seasoned litigator with extensive experience in litigation, policy, and advocacy, including a distinguished tenure as a public defender, where I passionately defended the rights of marginalized communities and upheld the principles of justice and fairness.

3. I have served as the Legal Director of Democracy Defenders Fund since July 2024. I graduated from West Virginia University College of Law in 2011 and am admitted to practice in Maryland, New Jersey, and the District of Columbia. I am additionally admitted to the bars of the U.S. District Court for the District of Maryland.

4. I have vast expertise in constitutional law and in class action litigation. *See J. Does*

1-26 v. Elon Musk, No. 25-cv-00462-TDC (D. MD. filed February 13, 2025), *Kimiesha Hill et al., v. Town of Valley Brook*, No. 5:21-cv-00097-PRW (D. Okla. Filed June 15, 2023), *Cottman et al., v. Baltimore Police Department*, 21-00837 (SAG) (D. MD. filed April 1, 2024), and *Joseph Allen et al., v. John Bel Edwards et al.*, No. 655079 (E. D. La. Filed Feb. 7, 2017).

5. Since August 2022 I have serve as an adjunct professor at Howard University School of Law and currently teach a civil right seminar. My classes facilitate interactive discussions on current civil rights events and help train and prepare the next generation of civil rights litigators.

6. While serving as the Managing Attorney at the Maryland Coalition Against Sexual Assault: Sexual Assault Legal Institute, I supervised a team of over fifteen attorneys and legal advocates in the provision of regional legal services to survivors of sexual assault in areas of immigration law, housing law, education law, employment law, protective and peace orders, family law, and criminal law. I litigated complex civil and criminal legal matters throughout the State of Maryland.

7. I worked as a leader of the Criminal Justice Project of the Lawyers' Committee for Civil Rights Under Law where I participated in the organization's management and served as lead counsel in litigation challenging the Patriot Front in Richmond and North Dakota to hold members of the white nationalist group accountable for acts of vandalism in Black and immigrant communities; challenging judges and other government entities to challenge the incarceration of indigent people who are unable to pay court-ordered fines and fees; challenging the improper administration of the provision of indigent defense services; challenging the excessive use of force; and the illegal search, seizure, and retention of crime victims' property.

Norman Eisen

1. Norman Eisen has served as the Co-Founder and Chair of Democracy Defenders Fund since 2023. This organization fights against election sabotage and autocracy: going on the offense against democracy deniers who break the law, including through its innovative program of outside public support for criminal prosecutions; working with national, state and local allies across the country to defend in real-time the foundation of our democracy, free and fair elections; and helping to shape the long-term strategy to defeat autocracy in 2025 and beyond.

2. Mr. Eisen graduated from Harvard Law School in 1991. He is admitted to practice in the District of Columbia and Maryland, in addition to being admitted to the bars of the U.S. Supreme Court, U.S. District Court of the District of Columbia, U.S. Circuit Court of Appeals for the District of Columbia, U.S. District Court for the District of Maryland, and U.S. Court of Appeals for the Second Circuit.

3. Mr. Eisen most recently served as Senior Fellow for Governance Studies at the Brookings Institution where he authored of *Trying Trump: A Guide to His First Election Interference Criminal Trial* (SDDF Books 2024); *States United: A Survival Guide for Our Democracy* (Cornell University Press 2022); *Overcoming Trumpery: How to Restore Ethics, the Rule of Law, and Democracy* (Brookings Institution Press 2022); *A Case for the American People: The United States v. Donald J. Trump* (Crown 2020); *The Last Palace: Europe's Turbulent Century in Five Lives and One Legendary House* (Crown 2018); *Democracy's Defenders: U.S. Embassy Prague, the Fall of Communism in Czechoslovakia, and its Aftermath* (Brookings Institution Press 2020); and numerous reports and other writings.

4. Mr. Eisen served as Special Counsel for the Committee on the Judiciary of the House of Representatives. As Counsel, he oversaw policy issues within the Committee's jurisdiction, including the investigation, impeachment and trial of President Donald Trump.

5. Mr. Eisen previously served on the Office of the White House Counsel as Special Assistant to the President and Special Counsel to the President for Ethics and Government Reform where he led the Obama administration's landmark initiatives on government ethics, lobbying regulation and transparency. Mr. Eisen represented White House Counsel's Office on the interagency group that produced the administration's blueprint for the Dodd-Frank financial regulatory reform and provided legal advice within White House on other aspects of 2009 economic recovery package, including the stimulus and the rescues of the auto and finance industries.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Tianna Mays
Tianna Mays

Executed on June 27, 2025.